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United States of America

IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

v.

ALEX MOYANO MORALES, ET AL,

Defendant.

CASE NO. 1:24-CR-00265-KES-BAM
STATUS REPORT BY UNITED STATES

DATE: August 27, 2025
TIME: 1:00 PM
JUDGE: Hon. Barbara A. McAuliffe

The government has corresponded with many of the parties in this case about their status. At least one defendant wishes to personally appear on August 27, 2025, and so the government intends to appear at the status conference on that date. The government anticipates that those defendants who do not timely file Rule 43 waivers will personally appear for the status conference. The government understands that all defendants in this case require a Spanish interpreter for court.

Many counsel have represented to the government that they are still evaluating the over 135,600 pages of discovery provided in the initial productions by the government. Additionally, the government has recently made available approximately 200 GB more of supplemental discovery.

The government anticipates that all defendants will be set for arraignment on a Superseding Indictment on August 27, 2025, immediately following the status conference that will add additional charges.

The government will be prepared to set this matter for trial at the status conference. However,

several defendants have indicated that they will need significant time to continue to evaluate discovery.

The government has previously represented that due to the nature of the prosecution spanning at least four judicial districts as well as a foreign jurisdiction, the volume of discovery, and the number of defendants, that it believes this case is a complex case within the meaning of 18 U.S.C. § 3161(h)(7)(B)(ii).

In light of the case's complexity, the volume of discovery, and the superseding indictment, the government will not object if any defendant seeks to set a further status conference. Some preliminary discussions have discussed a date in early 2026 for such a conference, with no trial date set.

Should at least one defendant request to continue the status conference, the government believes that an exclusion of time until that date is reasonable under the circumstances. Exclusion of time as to one defendant is exclusion of time as to all. *See, e.g., United States v. Butz*, 982 F.2d 1378 (9th Cir. 1993); *United States v. Baker*, 63 F.3d 1478, 1496 (9th Cir. 1995). *See also Henderson v. United States*, 476 U.S. 321, 323 n.2 (1986) ("All defendants who are joined for trial generally fall within the speedy trial computation of the latest codefendant.").

Dated: August 20, 2025

ERIC GRANT
United States Attorney

/s/ Robert L. Veneman-Hughes
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